

Derek W. Loeser (admitted *pro hac vice*)  
KELLER ROHRBACK L.L.P.  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com

Orin Snyder (admitted *pro hac vice*)  
GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, NY 10166-0193  
Tel.: 212.351.4000  
Fax: 212.351.4035  
osnyder@gibsondunn.com

Lesley E. Weaver (SBN 191305)  
BLEICHMAR FONTI & AULD LLP  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com

Deborah Stein (SBN 224570)  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Tel.: 213.229.7000  
Fax: 213.229.7520  
dstein@gibsondunn.com

*Plaintiffs' Co-Lead Counsel*  
*Additional counsel listed on signature page*

*Attorneys for Defendant Facebook, Inc.*  
*Additional counsel listed on signature page*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION

MDL No. 2843  
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER SEEKING TO TAKE THREE  
DEPOSITIONS BEYOND COURT  
IMPOSED DEADLINES**

Judge: Hon. Vince Chhabria  
Courtroom: VIA VIDEOCONFERENCE

**THE PARTIES STIPULATE AND AGREE AS FOLLOWS:**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs and Facebook, Inc. (collectively, the "Parties") submit this joint stipulation requesting a short extension of the July 22, 2022 deadline set by the Court to complete Rule 30(b)(6) depositions.

WHEREAS, on April 6, 2022, the Court entered an order modifying the case schedule under which the close of fact discovery is set for September 16, 2022 (Dkt. No. 908);

WHEREAS, on June 10, 2022, the Court set a deadline of June 30, 2022 to complete Rule 30(b)(6) depositions, except for certain topics for which the Court set a separate deadline of July 22, 2022, subject to the time it would take to resolve any issues going to the scope of these depositions before the Special Master and then to schedule (or reschedule) them (Dkt. No. 941);

WHEREAS, following resolution of certain issues before the Special Master or agreement by the parties on scope issues relating to Rule 30(b)(6) depositions and/or due to scheduling issues, the Parties have agreed to the following deadlines for all remaining Rule 30(b)(6) and fact depositions (with the proviso that additional testimony may be taken after these dates if good cause is shown or if the deposition is rescheduled by agreement of the parties, but in no case later than September 16, 2022 (with the exception of Ms. Sandberg's deposition)):

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 16, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;
- August 18, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

NOW THEREFORE, the Parties hereby stipulate, subject to Court approval, to the following exemptions from the existing case schedule and Court-ordered deadlines (with the proviso that additional testimony may be taken after these dates if good cause is shown or if the deposition is rescheduled by agreement of the parties, but in no case later than September 16, 2022 (with the exception of Ms. Sandberg's deposition)):

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 16, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;

- August 18, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

Dated: August 4, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser  
Derek W. Loeser

By: /s/ Lesley E. Weaver  
Lesley E. Weaver

Derek W. Loeser (admitted *pro hac vice*)  
Cari Campen Laufenberg (admitted *pro hac vice*)  
David Ko (admitted *pro hac vice*)  
Adele A. Daniel (admitted *pro hac vice*)  
Benjamin Gould (SBN 250630)  
Emma M. Wright (admitted *pro hac vice*)  
Daniel Mensher (admitted *pro hac vice*)  
Michael Woerner (admitted *pro hac vice*)  
Matthew Gerend (admitted *pro hac vice*)  
1201 Third Avenue, Suite 3200  
Seattle, WA 98101  
Tel.: (206) 623-1900  
Fax: (206) 623-3384  
dloeser@kellerrohrback.com  
claufenberg@kellerrohrback.com  
dko@kellerrohrback.com  
adaniel@kellerrohrback.com  
bgould@kellerrohrback.com  
ewright@kellerrohrback.com  
dmensher@kellerrohrback.com  
mwoerner@kellerrohrback.com  
mgerend@kellerrohrback.com

Lesley E. Weaver (SBN 191305)  
Anne K. Davis (SBN 267909)  
Matthew S. Melamed (SBN 260272)  
Angelica M. Ornelas (SBN 285929)  
Joshua D. Samra (SBN 313050)  
Javier Bleichmar (admitted *pro hac vice*)  
Joseph A. Fonti (admitted *pro hac vice*)  
555 12th Street, Suite 1600  
Oakland, CA 94607  
Tel.: (415) 445-4003  
Fax: (415) 445-4020  
lweaver@bfalaw.com  
adavis@bfalaw.com  
mmelamed@bfalaw.com  
aornelas@bfalaw.com  
jsamra@bfalaw.com  
jbleichmar@bfalaw.com  
jfonti@bfalaw.com

Christopher Springer (SBN 291180)  
801 Garden Street, Suite 301  
Santa Barbara, CA 93101  
Tel.: (805) 456-1496  
Fax: (805) 456-1497  
cspringer@kellerrohrback.com

Eric Fierro (admitted *pro hac vice*)  
3101 North Central Avenue, Suite 1400  
Phoenix, AZ 85012  
Tel: (602) 248-0088  
Fax: (602) 248-2822  
efierro@kellerrohrback.com

*Plaintiffs' Co-Lead Counsel*

GIBSON, DUNN, & CRUTCHER LLP

By: /s/ Rosemarie T. Ring

Orin Snyder (*pro hac vice*)  
osnyder@gibsondunn.com  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: 212.351.4000  
Facsimile: 212.351.4035

Deborah Stein (SBN 224570)  
dstein@gibsondunn.com  
333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Telephone: 213.229.7000  
Facsimile: 213.229.7520

Joshua S. Lipshutz (SBN 242557)  
jlipshutz@gibsondunn.com  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Telephone: 202.955.8500  
Facsimile: 202.467.0539

Rosemarie T. Ring (SBN 220769)  
rring@gibsondunn.com  
Kristin A. Linsley (SBN 154148)  
klinsley@gibsondunn.com  
Martie Kutscher (SBN 302650)  
mkutscherclark@gibsondunn.com  
555 Mission Street, Suite 3000  
San Francisco, CA 94105-0921  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

*Attorneys for Defendant Facebook, Inc.*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Derek W. Loeser, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of August, 2022, at Seattle, Washington.

/s/ Derek W. Loeser

Derek W. Loeser

**[PROPOSED] ORDER**

Pursuant to the stipulation of the Parties, the Court modifies the case schedule as follows:

- August 5, 2022. Deadline for further Rule 30(b)(6) deposition on portions of certain topics as they relate to targeted advertising;
- August 19, 2022. Deadline for further Rule 30(b)(6) deposition on Topic 10;
- August 26, 2022. Deadline for Rule 30(b)(6) deposition on Topic 5;
- September 1, 2022. Deadline for further Rule 30(b)(6) deposition on Topics 2/3 as they relate to ADI;
- September 20, 2022. Deadline for deposition of Sheryl Sandberg.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2022.

---

Hon. Vincent Chhabria  
United States District Judge